

H.1 - Environmental Assessment

- 1) Date: March 17, 2000
- 2) Name of sponsor: **Ciba Specialty Chemicals Corporation**
- 3) Address: 540 White Plains Road
P. O. Box 2005
Tarrytown, NY 10591-9005
- 4) Description of the proposed action:

It is proposed that 21 CFR 178.2010 of the food additive regulations be amended to allow for the use of benzenepropanoic acid, 3,5-bis(1,1-dimethylethyl)- 4-hydroxy-2- [3-[3,5-bis(1,1-dimethylethyl)- 4-hydroxyphenyl]- 1-oxopropyl] hydrazide, as a stabilizer for olefin polymers complying with 21 CFR § 177.1520, at a maximum use level of 0.12 percent. This product, marketed commercially as Irganox MD 1024, is a highly effective co-additive which acts as a stabilizer in these polymers.

- 5) Environmental consequences of the proposed action:

- a) Production of the food-contact substance:

Information regarding the production of the food-contact substance is not necessary since there are no extraordinary circumstances that pertain to its manufacture.

- b) Use and disposal of the food-contact substance:

This action involves a food -contact substance that is a minor component of finished food-packaging materials present at 0.12 percent-by-weight of the finished packaging material and remains with the packaging through its use by consumers. The principal routes of environmental introduction of the food-contact substance will result from its disposal in municipal solid waste combustors or in landfills. These disposal routes are governed by Environmental Protection Agency (EPA) regulations in 40 CFR part 60 (for combustors) and part 258 (for landfills). Based on the low levels of the food-contact substance in the packaging material, introduction of combustion products or introductions at landfill sites are not environmentally significant. Therefore, we do not expect that any limited increase in environmental introductions resulting from the proposed actions will threaten a violation of EPA regulations governing combustors and landfills or have any other adverse environmental effects.

- 6) Alternatives to the proposed action:

Alternatives to the proposed action need not be considered, because no potential adverse effects have been identified.

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7) List of Preparer :

Naeem Mady
Additives Division
Ciba Specialty Chemicals Corporation

8) Certification:

The undersigned certifies that the information presented is true, accurate and complete to the best of the knowledge of Ciba Specialty Chemicals Corporation.

March 17, 2000



Naeem Mady
Director, Regulatory Compliance
Ciba Specialty Chemicals Corporation

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